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January 19, 2018

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street  
Washington, D.C. 20554

Re: Q LINK WIRELESS LLC Petition for Expansion of ETC Service Area in Texas  
WC Docket No. 09-197

Dear Ms. Dortch:

Attached please find Q LINK WIRELESS LLC's ("Q LINK") petition for expansion of its Eligible Telecommunications Carrier ("ETC") designated service area in the State of Texas.

If you have any questions or if I may provide you with additional information, please do not hesitate to contact me. Thank you for your assistance.

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart, Esq.  
Managing Attorney  
Lance J.M. Steinhart, P.C.  
Attorneys for Q LINK WIRELESS LLC

Attachments

cc: Issa Asad

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**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
Universal Service Support	)	
	)	
Q LINK WIRELESS LLC	)	
	)	
Petition for Expansion of ETC Service Area	)	
in the State of Texas	)	

**Q LINK WIRELESS LLC'S PETITION FOR EXPANSION OF  
ETC SERVICE AREA IN THE STATE OF TEXAS**

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January 19, 2018

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## SUMMARY

Q LINK WIRELESS LLC (“Q LINK”) hereby seeks expansion of its Eligible Telecommunications Carrier (“ETC”) designated service area in the State of Texas. The Public Utility Commission of Texas (“Texas PUC”) granted Q LINK ETC Designation on October 10, 2012, but Q LINK would like to expand its existing ETC service area designation in Texas. However, since Q LINK’s designation in Texas, the Texas PUC has provided an affirmative statement that it does not exercise jurisdiction over wireless providers for purposes of Lifeline-only ETC designation. Accordingly, Q LINK respectfully requests that the Commission expand its existing ETC service area designation in Texas pursuant to its authority under Section 214(e)(6).

Q LINK meets all of the requirements under Section 214(e)(1) for limited ETC designation except for providing service, at least in part, using its own facilities. However, the FCC has granted forbearance from enforcement of this facilities requirement for purposes of participation in the Lifeline program. Q LINK is a Mobile Virtual Network Operator (“MVNO”) that purchases wireless service on a wholesale basis from the networks of Sprint and T-Mobile. Through its contracts to provide services on the networks of these underlying carriers, Q LINK has the ability to offer all of the services supported by the universal service fund and as set forth in Section 54.101(a) of the Commission’s rules. Q LINK offers Lifeline plan options that meet or exceed the voice and/or broadband minimum service requirements. Q LINK also offers low-income Lifeline consumers the ability to choose to receive a Wifi-enabled smartphone, tablet device, or hotspot internet device to use with Q LINK’s Lifeline service. Q LINK distributes its services without using any third-party street agents. This allows Q LINK to reach out to serve customers outside of the core urban areas in which most other Lifeline providers have focused, with the result that approximately 85 percent of Q LINK’s existing subscribers were new to

Lifeline when they enrolled. Q LINK also has a very low churn. Q LINK maintains strong systems to verify applicant identity and eligibility, including multiple checks of USPS, NLAD, Lexis/Nexis, Melissa Database, State and Federal databases and other third-party databases. Q LINK never allows third parties to distribute wireless handsets in person, and will only mail handsets to customer addresses that it can verify.

Q LINK is one of the nation's largest Lifeline providers, serving over 1 million low-income households in 29 states. Q LINK has a proven track record of providing Lifeline service while maintaining strict eligibility safeguards, as well as reaching Lifeline customers outside of urban areas. Q LINK is thus ideally positioned to deliver Lifeline-supported voice telephony and broadband internet access services to qualified low-income Texans throughout a larger footprint in Texas, including many rural areas which have yet to reap the benefits of a competitive wireless marketplace because of financial constraints, poor credit history, or intermittent employment. Q LINK's prepaid service offerings are ideally suited to provide these customers with reliable and cost-effective wireless services. Accordingly, expansion of Q LINK's ETC service area in Texas will serve the public interest; and the Commission should grant this petition without delay.

**Before the  
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In the Matter of	)	
	)	
Telecommunications Carriers Eligible for	)	WC Docket No. 09-197
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	)	
Q LINK WIRELESS LLC	)	
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**Q LINK WIRELESS LLC’S PETITION FOR EXPANSION OF  
ETC SERVICE AREA IN THE STATE OF TEXAS**

**I. INTRODUCTION**

Q LINK WIRELESS LLC (“Q LINK”), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), and Sections 54.201 and 54.202 of the rules of the Federal Communications Commission (“FCC” or “Commission”),<sup>1</sup> hereby submits this Petition requesting expansion of its existing Eligible Telecommunications Carrier (“ETC”) service area in the State of Texas, to include all areas in which its underlying facilities-based carrier networks provide voice and 3G or LTE CMRS data services. Q LINK seeks expansion of

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<sup>1</sup> 47 C.F.R. §§54.201, 54.202; *see also In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”) and *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 00-197, WC Docket No. 10-90, Third Report and Order, and Order on Reconsideration, FCC 16-38 (rel. Apr. 27, 2016) (“*Lifeline Modernization Order*” or “*Third Report and Order*”).

its ETC service area only for purposes of participation in the low-income Universal Service Fund's ("USF") Lifeline program; Q LINK does not receive or request High-Cost support.

Because the Public Utility Commission of Texas (the "Texas PUC") lacks jurisdiction over wireless ETC designations, the Commission, under Section 214(e)(6) of the Communications Act, has the authority to consider and grant this request. As more fully described below, Q LINK satisfies the requirements for designation as an ETC. Q LINK has already demonstrated its ability to provide low-income Lifeline services as it has grown to serve over a million Lifeline households, while maintaining strong processes for verifying applicant identity and eligibility. Q LINK already provides Lifeline voice and broadband services meeting the Commission's mandatory minimum requirements, and provides either a smartphone, tablet or hotspot device for use with Q LINK's services. Grant of Q LINK's request will promote the public interest by providing additional low-income Texans—particularly those outside of the urban core—with high quality wireless and mobile broadband services at discounted Lifeline rates, advancing the Commission's goal of making voice and broadband service more affordable and accessible to those who can least afford it.

## **II. BACKGROUND**

### **A. Company Overview**

Q LINK is a Delaware limited liability company, organized on August 25, 2011, with principal offices located at 499 East Sheridan Street, Suite 400, Dania Beach, Florida 33004. Q LINK is wholly owned by its parent, Quadrant Holdings Group LLC ("Quadrant Holdings"). Quadrant Holdings is also a Delaware limited liability company with principal offices located at 499 East Sheridan Street, Suite 400, Dania Beach, Florida 33004. Quadrant Holdings also owns 100% of Centurion Logics, LLC, a Florida limited liability company that provides proprietary back-end software and is not a regulated entity. As of 2016, Q LINK has one subsidiary, Qlixar



Corporation, a Puerto Rico corporation fully owned by Q LINK. Qlixar Corporation provides mobile advertising and is not a regulated entity. Quadrant Holdings and Q LINK do not have any other subsidiaries.

As a reseller of wireless services, Q LINK purchases wireless network infrastructure and wireless transmission facilities through wholesale agreements to operate on the networks of T-Mobile USA (“T-Mobile”) and Sprint Spectrum L.P. (“Sprint”) pursuant to existing agreements. Sprint and T-Mobile are nationwide carriers that provide wholesale capacity on their wireless networks to resellers like Q LINK. Q LINK provides affordable prepaid mobile phone service, including calling, text messaging, and broadband access, along with user-friendly smartphone handsets, tablet or hotspot devices, and high-quality customer service. Q LINK’s products and plans are specially geared toward serving low income communities, and its service models and pricing plans reflect this mission. The Company does not require service contracts from its customers and it will always ensure competitively low pricing for its services and products. By providing affordable service, Q LINK can reach out to those who are often ignored by traditional carriers due to its unique marketing model that reaches the unserved or underserved markets.

Since 2012, Q LINK has provided Lifeline services in those states in which it has held ETC designations, including Texas. Q LINK’s prepaid wireless services are affordable, easy to use, and attractive to low-income and lower-volume consumers. When used with a voice-capable device, Q LINK’s Lifeline services provide consumers with access to emergency services. Many of Q LINK’s Lifeline customers are unlikely to have had phone service or broadband access of any kind prior to enrollment. Q LINK’s customers will depend on, and benefit greatly from, Q LINK’s inexpensive and flexible pricing plans. Q LINK does not impose credit checks nor require any deposits or contractual commitments. Most of Q LINK’s customers turn to Q LINK because they cannot afford the postpaid services provided by traditional wireless carriers.

Q LINK will continue to affirmatively reach out to the low-income sector of the consumer base to offer attractive and affordable communications options. As such, Q LINK will contribute to the expansion of mobile wireless and broadband services for low-income consumers, which is one of the principal objectives of the universal service program established by Congress and codified in Section 254 of the Act, 47 U.S.C. § 254.

Q LINK is dedicated to quality customer service and care. Lifeline customers can reach Q LINK's Customer Service department via phone, mail, e-mail, fax, or online. Q LINK's Customer Service department is available via phone on customers' Q LINK phones by dialing 611, or by dialing Q LINK's toll-free number 1-855-QLINK43 (1-855-754-6543), via mail at Q LINK WIRELESS LLC, Attn: Support Department, 499 East Sheridan Street, Suite 400, Dania, FL 33004, via e-mail at [support@qlinkwireless.com](mailto:support@qlinkwireless.com), via fax at 1-855-83QLINK (1-855-837-5465), or online at Q LINK's website [www.qlinkwireless.com](http://www.qlinkwireless.com).

Q LINK maintains a very rigorous and highly automated process for verifying the identity and eligibility of customers that apply for Lifeline service. Q LINK never employs third party street agents. The vast majority of its applications are completed online, including through Q LINK's patent-pending kiosks in limited areas in Texas, with the remainder completed by phone supplemented by mail submission of required documents. Q LINK does not use any third-party agents to obtain customers. Q LINK's process includes multiple checks against NLAD, USPS, Melissa, Lexis/Nexis, and CGM databases. Q LINK has a compliance staff that conducts a review of each Lifeline application received, and it only ships phones to a customer's verified residential address. As a result, Q LINK has been through thirty-one (31) government or Universal Service Administrative Company ("USAC") reviews without a finding of a duplicate Lifeline household in those audits.

Q LINK's automated model, and its patent-pending kiosks once fully deployed, allow Q LINK to make wireless Lifeline available in less dense areas that have not been a focus of other Lifeline providers. Q LINK's business model is unique in that Q LINK is able to reach unserved and underserved Lifeline-eligible consumers; in fact, eighty-five per cent (85%) of Q LINK's Lifeline customers are *new* and have not previously participated the Lifeline program. Q LINK has best-in-class customer service, satisfaction, and retention, with one of the lowest churn (customer turnover) rates in the industry.

#### **B. Q LINK's ETC Designations**

Q LINK is currently designated as an ETC in the following jurisdictions: Arizona, Arkansas, Colorado, Georgia, Hawaii, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Minnesota, Missouri, Nevada, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Vermont, Washington, West Virginia, and Wisconsin. Q LINK also has petitions for ETC designation pending before the following jurisdictions: California, Illinois, Massachusetts, Mississippi, New Jersey, New Mexico and Oregon; and Q LINK has applications for designation as an ETC and a national Lifeline Broadband Provider before the Commission.<sup>2</sup>

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<sup>2</sup> See *In the Matter of Federal-State Joint Board on Universal Service*, WC Docket No. 09-197, Q LINK WIRELESS LLC Fourth Amended Petition for Limited Designation as an Eligible Telecommunications Carrier in the States of Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia, and the District of Columbia (Aug. 26, 2015) and Petition for Designation as a Lifeline Broadband Provider (Sep. 22, 2016).

When Q LINK received ETC designation from the Texas PUC, it was limited to certain non-rural incumbent service areas.<sup>3</sup> Q LINK had intentions of applying with the Texas PUC to expand its ETC designation to include service areas of rural incumbent carriers; however, the Texas PUC has ceased to retain jurisdiction over wireless ETCs (see section II.C below and Exhibit B), and as a result, Q LINK is making such request to the Commission.

### **C. The Commission Has Authority to Grant the Instant Request**

Pursuant to Section 214(e)(6), the Commission may designate as an ETC “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a state commission.”<sup>4</sup> The Commission has established that a carrier must demonstrate that it “is not subject to the jurisdiction of a state commission” before it may consider an application for ETC designation.<sup>5</sup> The Commission also has stated that any carrier seeking ETC designation from it must provide the Commission with an “affirmative statement” from the state PUC that it lacks jurisdiction to perform the ETC designation.”<sup>6</sup>

The Texas PUC has concluded that it “will exclude CMRS resellers from eligibility for designation by the commission as an ETC” and instead, “a CMRS reseller will be able to seek designation as an ETC by the FCC.” A copy of the Texas PUC’s Order is attached hereto as

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<sup>3</sup> See *Application of Q LINK WIRELESS LLC for Designation as an Eligible Telecommunications Carrier in the State of Texas for the Limited Purpose of Offering Lifeline*, Docket No. 40681, Order No. 3 (October 10, 2012).

<sup>4</sup> See 47 U.S.C. § 214(e)(6).

<sup>5</sup> See *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, Public Notice, 12 FCC Rcd 22947, 22948 (1997).

<sup>6</sup> See *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12264 ¶ 113 (2000).

Exhibit B. Accordingly, for the requested service area expansion in Texas, Q LINK is “a common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission.”<sup>7</sup> As such, the Commission is authorized to expand Q LINK’s ETC-designated service area in Texas.

### **III. Q LINK SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC**

As detailed below, Q LINK satisfies each of the requirements of Section 214(e)(1) of the Act and Sections 54.201-54.202 of the Commission’s rules.

#### **A. Q LINK is a Common Carrier**

Q LINK is a common carrier as defined in 47 U.S.C. § 153(11). The FCC has consistently held that providers of wireless services like Q LINK are treated as common carriers for regulatory purposes. Further, Section 332(c)(1)(A) of the Act states that CMRS providers will be regulated as common carriers.<sup>8</sup> Q LINK has registered as such with the FCC.<sup>9</sup>

#### **B. Q LINK Will Provide the Supported Services**

The FCC has determined that “voice telephony services” and “broadband services” shall be supported by the federal USF program.<sup>10</sup> Eligible voice telephony services must provide:

- voice grade access to the public switched network;
- local usage;
- access to emergency services; and
- toll limitation for qualifying low-income consumers.

Eligible broadband services must provide:

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<sup>7</sup> 47 U.S.C. § 214(e)(6).

<sup>8</sup> See 47 U.S.C. § 332(c)(1)(A).

<sup>9</sup> See <http://apps.fcc.gov/cgb/form499/499detail.cfm?FilerNum=829223>.

<sup>10</sup> 47 C.F.R. § 54.101(a).

- the capability to transmit data to and receive data from all or substantially all internet endpoints.

Q LINK provides each of the required voice and broadband services, as described in more detail below. Q LINK's Lifeline service offerings will be provided pursuant to the Company's established rates, as provided in this Petition, and pursuant to its terms and conditions of service, which are available at Q LINK's website at <https://qlinkwireless.com/terms>.

### **1. Means of Providing Service**

Q LINK provides service via resale of underlying carrier services, currently provided by T-Mobile and Sprint. Section 214(e)(1)(A) of the Act provides that an ETC must provide services "using its own facilities or a combination of its own facilities and resale of another carrier's services."<sup>11</sup> Pursuant to the FCC's *Lifeline Reform Order*, however, resellers are granted blanket forbearance from this facilities requirement, subject to conditions, in connection with limited ETC designation to participate in the Lifeline program.<sup>12</sup> The FCC conditioned blanket forbearance on the reseller's compliance with certain ETC obligations, including providing 911 and E911 service regardless of activation status and prepaid minutes available, providing E911-compliant handsets, and replacing E911 non-compliant handsets at no charge to the Lifeline customer.<sup>13</sup> In addition, the reseller must adhere to an FCC-approved compliance plan that includes specific information about the reseller's service offerings and that outlines the measures that the reseller will take to implement the obligations established in the *Lifeline*

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<sup>11</sup> 47 U.S.C. § 214(e)(1)(A).

<sup>12</sup> See *Lifeline Reform Order* at ¶¶ 368, 373 and 379

<sup>13</sup> *Id.* at ¶ 373.

*Reform Order*.<sup>14</sup> Q LINK has committed to compliance with all of these conditions, and submitted to the FCC its Third Revised Compliance Plan on July 30, 2012, which the FCC approved on August 8, 2012, that meets the requirements of the *Lifeline Reform Order*.

## **2. Voice Grade Access**

The FCC describes “voice grade access” as the ability for a user to make and receive telephone calls within a specified bandwidth. Q LINK provides voice grade access to the public switched telephone network (“PSTN”) through the resale of T-Mobile and Sprint mobile services to low-income customers in its designated service area.

## **3. Local Usage**

The FCC’s rules require an ETC to offer minutes of use for local service at no additional charge. Q LINK currently offers, and will offer to customers in the proposed additional service areas in Texas upon approval, the Lifeline service packages attached hereto as Exhibit 3. Exhibit 3 demonstrates that Q LINK will provide Lifeline customers with a free data-capable Android handset, tablet, or hotspot device, and a choice of plans with at least 1,000 voice minutes or 1 gigabyte (GB) of data at 3G speed each month. Q LINK certifies that it will advertise and provide Lifeline rate plans that meet applicable minimum service requirements set forth in 47 C.F.R §54.408(b)(2), including as such requirements increase going forward.

Q LINK’s Lifeline customers will be able to place calls to 911 emergency services for free, regardless of service activation or availability of minutes, and calls to Q LINK customer service are also free. As detailed in Exhibit 3, Lifeline customers will have the capability of

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<sup>14</sup> See *Lifeline Reform Order* at ¶ 368.

purchasing additional minutes and/or data in denominations as low as \$5 and \$10 by contacting Q LINK by phone, or online at [www.qlinkwireless.com](http://www.qlinkwireless.com).

#### **4. Access to Emergency Services**

The Company will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available. As noted, calls to 911 emergency services will always be free and will be available regardless of service activation status or availability of minutes. In addition, Q LINK will comply with any FCC requirements regarding customer access to 911 and E911 services as well as the provision of E911-compatible handsets, specifically including those obligations imposed as part of the FCC's forbearance grant conditions.

#### **5. Toll Limitation for Qualifying Low-Income Customers**

Like most wireless carriers, Q LINK does not differentiate domestic long-distance usage from local usage, and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such "all-distance" services are not considered to have voluntarily elected to receive toll limitation services ("TLS"),<sup>15</sup> and "ETCs are not required to offer toll limitation service to low-income consumers if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls."<sup>16</sup> If, in the future, Q LINK should offer a Lifeline service which differentiates between local usage and long distance usage, the Company commits to provide TLS to customers of that service.

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<sup>15</sup> *Lifeline Reform Order*, ¶ 230.

<sup>16</sup> *Id.* at ¶¶ 49 and 367.



## **6. Broadband Internet Access Service**

The FCC has stated that broadband access consists of the ability for a user to receive “the capability to transmit data to and receive data from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up Internet access service.”<sup>17</sup> Q LINK will provide this service via resale of T-Mobile and Sprint mobile services to low-income customers in its designated service area.

## **7. Requested Service Area**

Sections 214(e)(1) and 214(e)(5) of the Act provide that ETC designations shall be made for a “service area,” defined as a geographic area established by the Commission. Q LINK requests that its ETC designation in Texas be expanded to include the service areas set forth in Exhibit 4. Q LINK understands that its service area overlaps with several rural carriers’ service areas but maintains that the public interest factors described below justify its designation in these service areas, especially since it only seeks ETC designation for purposes of participation in the low-income Lifeline program. Q LINK does not seek authority to provide enhanced Lifeline service to eligible residents of federally-recognized Tribal lands.

### **C. Q LINK Will Advertise the Supported Services**

Q LINK will advertise the availability and rates for the services described above using media of general distribution as required by 47 C.F.R. §54.201(d)(2) and in accordance with the requirements set forth in the *Lifeline Reform Order*.<sup>18</sup> As the Commission has clarified, ““media

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<sup>17</sup> *Lifeline Reform Order* at ¶30; *see also* 47 C.F.R. § 8.2(a) (defining broadband Internet access service).

<sup>18</sup> *See Lifeline Reform Order*, Section VII.F. See attached Exhibit 5 for a sample advertisement.

of general distribution may include web advertisements reasonably calculated to reach the relevant community, mail, email, or other text-based methods of advertising.”<sup>19</sup> Q LINK has been very successful at targeting online advertising to low income consumers through business or public internet addresses, including through search engines and social media. Q LINK will continue to advertise its services in this manner, which has allowed it to grow organically to become one of the principal Lifeline providers in the nation. Moreover, Q LINK will expand its advertising efforts as necessary to ensure that Lifeline-eligible customers are aware of the Company’s service offerings.<sup>20</sup>

In addition, Q LINK will comply with the FCC’s rules regarding information to be included in marketing materials, including FCC rule section 54.405(c). Specifically, Q LINK’s marketing materials will state, in easily understood language, that: (i) the service is a Lifeline service; (ii) Lifeline is a government assistance program; (iii) the service may not be transferred to someone else; (iv) consumers must meet certain eligibility requirements before enrolling in the Lifeline program; (v) the Lifeline program permits only one Lifeline discount per household; (vi) documentation is necessary for enrollment; and (vii) Q LINK is the provider of the services. Moreover, Q LINK’s Lifeline application/certification form will state that Lifeline is a federal benefit and that consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program. A sample of Q LINK’s application form is attached as Exhibit 6.

#### **D. Q LINK Will Comply with Applicable Service Requirements**

In accordance with 47 C.F.R. § 54.202(a)(1)(i), and by the attached certification, Q LINK

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<sup>19</sup> See *Lifeline Modernization Order* ¶ 364.

<sup>20</sup> 47 C.F.R. § 54.405(b).

certifies that it will comply with the service requirements applicable to the low-income support that it receives. Q LINK's Lifeline-supported services will meet or exceed the minimum service standards and equipment requirements set forth in 47 C.F.R. § 54.408. Q LINK's handsets, tablets or hotspots provided to consumers will all be WiFi enabled, and Q LINK will not impose an additional or separate tethering charge for mobile data usage below the minimum standard. Q LINK offers smartphones, tablets and hotspot devices in order to meet the requirements of 54.408(f)(3). Because Q LINK seeks ETC designation in order to provide supported services only under subpart E of Part 54 of the Commission's Rules, submission of a five-year plan under 47 C.F.R. § 54.202(a)(1)(ii) is not required.

**E. Q LINK is Able to Remain Functional in Emergency Situations**

In accordance with 47 C.F.R. §54.202(a)(2), Q LINK has the ability to remain functional in emergency situations. As discussed, Q LINK will utilize the extensive and well-established Sprint and T-Mobile networks and facilities to provide Q LINK's services. The Company understands that the Sprint and T-Mobile networks are capable of managing traffic spikes that may occur during emergency situations and can reroute traffic in the event of damaged facilities. Q LINK also understands that each carrier has sufficient back-up power to ensure functionality if its external power supply is unavailable. Indeed, both companies have repeatedly certified to the FCC that their networks functional in emergency situations.<sup>21</sup> Sprint and T-Mobile will provide the same functionality to Q LINK and Q LINK's customers as these carriers provide to

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<sup>21</sup> See, e.g., *Sprint Nextel Corporation Verified Filing in Compliance with 47 C.F.R. § 54.209*, CC Docket No. 96-45, at 6 (filed Sept. 30, 2011); *In the Matter of Telecommunications Carriers Eligible for Universal Service Support, Petition of T-Mobile USA, Inc. for Designation as a Low-Income Eligible Telecommunications Carrier, et al.*, WC Docket No. 09-197, at 20 (released Aug. 16, 2012).

themselves and their own customers.

**F. Q LINK Will Satisfy Consumer Protection and Service Quality Standards**

In accordance with 47 C.F.R. §54.202(a)(3), Q LINK commits to satisfying applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Q LINK commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service.

**G. Q LINK is Financially and Technically Capable**

The FCC's rules require ETC petitioners to demonstrate financial and technical capability to comply with the FCC's Lifeline service requirements.<sup>22</sup> Among the factors to be considered are: a carrier's prior offering of service to non-Lifeline subscribers; the length of time the carrier has been in business; whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources; and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding.

Q LINK is financially and technically capable of providing Lifeline-supported services in accordance with 47 C.F.R. §54.202(a)(4). Indeed, this Commission has previously determined Q LINK to be financially and technically capable; the Commission reviewed Q LINK's financial and technical capability while evaluating Q LINK's Compliance Plan, which was approved on August 8, 2012. Since it began operations in 2012, Q LINK has grown to be one of the principle Lifeline providers in the nation. And Q LINK receives revenue from a number of sources which are completely independent from the revenue it will receive in the form of Lifeline support.

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<sup>22</sup> *Lifeline Reform Order*, 387-388 (revising 47 C.F.R. § 54.202(a)(4)).

Q LINK does not and will not rely exclusively on USF disbursements to operate. In fact, Q LINK provides non-Lifeline service to over 70,000 customers.

In addition, Q LINK's financial and technical capabilities to provide service are demonstrated by its performance over five plus years, with consistently strong service, organic growth, and robust protections to ensure its Lifeline customers meet eligibility requirements. Q LINK has employed a state-of-the-art proprietary fraud prevention system and does not utilize agents or third-party representatives for Lifeline enrollment, and does not pay any commissions or sales incentives on Lifeline sign-ups. Indeed, Q LINK does not use street agents, and does not hand out phones at the time of sign-up; instead, Q LINK utilizes UPS with tracking service and mails handsets directly to the applicant's household address only after being qualified to receive Lifeline support. This direct-to-customer model utilizes technology to protect against waste, fraud and abuse. Notably, Q LINK has successfully passed thirty-one (31) routine government audits led by USAC or state audits with no instances of duplicates in those audits. In August 2017, Q LINK also completed and passed its Bi-Annual Audit, and the Company has not been subject to ETC enforcement sanctions or revocation proceedings in any state, apart from a minor late filing penalty in Kansas from 2014.<sup>23</sup>

Furthermore, the senior management of Q LINK has great depth in the telecommunications industry and offers extensive telecommunications business technical and managerial expertise to Q LINK. Copies of Q LINK's key management bios are appended as Exhibit 7. Q LINK performs all the following functions in-house: billing, technology and

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<sup>23</sup> In 2014, Q LINK was assessed a \$300 penalty related to filing a portion of the Kansas annual report late due to misinterpretation of the filing requirements. Q LINK has since taken action to ensure all filings are timely submitted.

software development, kiosk development and technology, marketing/sales, accounting, customer service, representative training, control over the enrollment and verification process, and fulfillment of all orders direct to consumers. Q LINK's infrastructure was designed, built, and operates completely in-house at its state-of-the-art approximately 36,000 sq. foot facility in Dania, Florida. Q LINK provides resold wireless service, and therefore will also rely upon the managerial and technical expertise of its underlying carriers.

#### **H. Q LINK Will Comply with Certification and Verification Requirements**

Section 54.410 of the FCC's Rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Q LINK is aware of the requirements regarding certification and verification of a customer's qualification for Lifeline service and has implemented procedures to ensure these requirements are met. As described in Q LINK's Compliance Plan, the Company has set in place detailed and comprehensive procedures to address customer certification and verification requirements as well as requirements concerning de-enrollment and duplication of service.

In addition, Q LINK affirms that it will comply with the FCC's revisions to Section 54.410(a). Specifically, Q LINK has the following checklist in place to make sure that a potential subscriber's eligibility determination takes place prior to activating Lifeline service for a consumer:

- Assure that the consumer is not an existing Q LINK customer;
- Assure that the consumer is not receiving a Lifeline benefit from another company through available verification databases such as the National Lifeline Accountability Database ("NLAD");
- Confirm that there is not a duplicate address in existence in the Q LINK active customer database;

- Send a non-activated handset to qualified addresses only; and
- Require the consumer to activate the phone prior to receiving any Lifeline service.

Q LINK further confirms that it will not provide a consumer with an activated device and will not activate a Lifeline service unless or until it has confirmed that the consumer is a qualifying low-income consumer pursuant to the streamlined criteria set forth in 47 C.F.R. § 54.409, and completed the required eligibility determination and certification requirements of 47 C.F.R. §§ 54.410(a), 54.404-54.405. These procedures comply with the FCC’s customer certification and verification requirements.<sup>24</sup>

Q LINK also complies with both the FCC’s annual certification and reporting requirements and the FCC’s measures to prevent waste, fraud and abuse of Lifeline services. In particular, Section III.E of Q LINK’s Compliance Plan discusses steps that the Company will take to ensure activation of service and to implement de-enrollment in the event of inactivity, and commits to compliance with the FCC’s guidance on non-usage and recertification, as amended. Q LINK has updated its non-usage policy in accordance with current federal regulations (*see* 47 C.F.R. §§ 54.405(e)(3) and 54.407(c)). An account will be considered active if the authorized subscriber establishes usage, as “usage” is defined by 47 C.F.R. § 54.407(c)(2), during the specified timeframe, currently a period of thirty (30) days, or during the notice period set forth in 47 C.F.R. § 54.405(e)(3), currently a period of fifteen (15) days. In accordance with 47 C.F.R. § 54.405(e)(3), Q LINK will provide the subscriber advanced notice, using clear, easily understood language, that the subscriber’s failure to use the Lifeline service within the notice period will

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<sup>24</sup> 47 C.F.R. § 54.410.

result in service termination for non-usage. Lifeline customers who have their service disconnected will not be claimed by Q LINK for USAC reimbursement.

#### **IV. EXPANSION OF Q LINK'S ETC SERVICE AREA WILL SERVE THE PUBLIC INTEREST**

Expansion of Q LINK's ETC service area in Texas will further the Commission's universal service goals to the benefit of many more Texans than Q LINK is currently able to serve. Whether because of financial constraints, poor credit or sporadic employment, low-income consumers often lack access to the benefits of wireless telecommunications and mobile broadband service. Specifically, the Company will offer prepaid low cost wireless service to low-income consumers (after application of the Lifeline support), thereby increasing consumer choice and the Texas public's access to telephone and broadband services. Increasing customer choice throughout additional service areas, including rural areas, in Texas will spur other ETC providers in the respective areas to compete for eligible customers by providing the highest value (e.g., higher quality handsets, superior customer service). The mobility of the service will be particularly attractive to Lifeline-eligible consumers who may frequently change residences or work in migratory jobs. Wireless voice and broadband service offers a stable contact method where traditional landline service would be unavailable or not a viable option. Q LINK's prepaid wireless service is an especially attractive option for low-income consumers because it alleviates customer concerns regarding hidden costs, varying monthly charges and long-term contract issues. The ability to meet communications and broadband access needs while at the same time anticipating and controlling the associated costs is critical for low-income customers.



With regard to Internet in particular, which the FCC recently called “today’s vital communications network...the most powerful and pervasive platform in our Nation’s history,”<sup>25</sup> the Commission noted that “Only half of all households in the lowest income tier subscribe to a broadband service and 43 percent say the biggest reason for not subscribing is the cost of the service,” and “Of the low income consumers who have subscribed to mobile broadband, over 40 percent have to cancel or suspend their service due to financial constraints.”<sup>26</sup> Expansion of Q LINK’s ETC service area in Texas would allow Q LINK to provide discounted Lifeline services—including Lifeline-supported broadband service—to these low income consumers, providing them with a way to obtain broadband internet access of 1 GB at no charge after application of Lifeline support, and with the ability to access voice service or additional data. The public interest benefits to low-income consumers of Q LINK’s wireless service include the convenience and security afforded by mobile service and a generous amount of voice and broadband access included without cost (after application of the Lifeline support), as well as free access to caller ID, call waiting, and voicemail features, and access to 911 services regardless of the number of voice minutes remaining on the Lifeline consumer’s plan. These affordable consumer services are an invaluable resource for emergency services and for cash-strapped consumers who may be seeking employment and need a means to contact potential employers. Q LINK’s wireless Lifeline service is also useful for those consumers that need the ability to stay in touch with children or other family members, as well as to contact 911 emergency services when needed. Q LINK’s services will provide consumers with a valuable alternative for obtaining telephone service and broadband access. Providing Q LINK with the authority

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<sup>25</sup> See *Lifeline Modernization Order* ¶ 1.

<sup>26</sup> *Id.*, ¶ 2.

necessary to offer no-cost or discounted Lifeline services to those currently without access to essential telephone and broadband services, or those most in danger of losing wireless service altogether, promotes the public interest.

## **V. ANTI-DRUG ABUSE CERTIFICATION**

Q LINK certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

## **VI. CONCLUSION**

Based on the foregoing, expansion of Q LINK's ETC service area in Texas accords with the requirements of Section 214(e)(6) of the Act and is in the public interest.

WHEREFORE, Q LINK respectfully requests that the Commission expand Q LINK's ETC designation in Texas to include the service areas requested herein.

Respectfully submitted,

/s/ LANCE STEINHART

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*Attorneys for Q LINK WIRELESS LLC*

January 19, 2018

## **EXHIBIT 1**

### **Certification of Company Officer**

## DECLARATION OF Q LINK WIRELESS LLC

I, Issa Asad, do hereby declare under penalty of perjury as follows:

1. I am Chief Executive Officer of Q LINK WIRELESS LLC ("Q LINK"), a Delaware limited liability company with its principal place of business at 499 East Sheridan Street, Suite 400, Dania Beach, Florida 33004.
2. To the best of my knowledge, Q LINK, including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting), is not subject to denial of federal benefits, including Federal Communications Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.
3. I declare under penalty of perjury that the information provided in the foregoing Petition is true and correct to the best of my knowledge and belief.

Executed on Jan 16, 2018.



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Issa Asad, Chief Executive Officer  
Q LINK WIRELESS LLC

## **EXHIBIT 2**

### **Affirmative Statement from Texas PUC**

**PROJECT NO. 40561**

**RULEMAKING TO AMEND §  
SUBSTANTIVE RULE 26.418 RELATING §  
TO DESIGNATION OF COMMON §  
CARRIERS AS ELIGIBLE §  
TELECOMMUNICATIONS CARRIERS §  
TO RECEIVE FEDERAL UNIVERSAL §  
SERVICE FUNDS §**

**PUBLIC UTILITY COMMISSION**

**OF TEXAS**

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FILED CLERK

**ORDER ADOPTING AMENDMENT TO §26.418  
AS APPROVED AT THE NOVEMBER 16, 2012 OPEN MEETING**

The Public Utility Commission of Texas (commission) adopts an amendment to §26.418, relating to Designation of Common Carriers as Eligible Telecommunications Carriers to Receive Federal Universal Service Funds, with no changes to the proposed text as published in the August 31, 2012, issue of the *Texas Register* (37 TexReg 6874). The amendment will exclude commercial mobile radio service (CMRS) resellers from eligibility for designation by the commission as an eligible telecommunications carrier (ETC). Instead, a CMRS reseller will be able to seek designation as an ETC by the Federal Communications Commission (FCC). Project Number 40561 is assigned to this proceeding.

The commission did not receive any comments on the proposed amendment.

The amendment is adopted under the Public Utility Regulatory Act, Texas Utilities Code Annotated §14.002 (West 2007 and Supp. 2012) (PURA), which provides the commission with the authority to make and enforce rules reasonably required in the exercise of its powers and jurisdiction; and specifically §51.001, which provides that it is the policy of this state to promote diversity of telecommunications providers and interconnectivity; encourage a fully competitive

telecommunications marketplace; and maintain a wide availability of high quality interoperable, standards-based telecommunications services at affordable rates.

Cross Reference to Statutes: PURA §§14.002 and 51.001.

**§26.418. Designation of Common Carriers as Eligible Telecommunications Carriers to Receive Federal Universal Service Funds.**

- (a) **Purpose.** This section provides the requirements for the commission to designate common carriers as eligible telecommunications carriers (ETCs) to receive support from the federal universal service fund (FUSF) pursuant to 47 United States Code (U.S.C.) §214(e) (relating to Provision of Universal Service). In addition, this section provides guidelines for rural and non-rural carriers to meet the federal requirements of annual certification for FUSF support criteria and, if requested or ordered, for the disaggregation of rural carriers' FUSF support.
- (b) **Applicability.** This section applies to a common carrier seeking designation as an ETC, except for commercial mobile radio service (CMRS) resellers. A CMRS reseller may not seek designation from the commission, but instead may seek designation as an ETC by the Federal Communications Commission (FCC). This section also applies to a common carrier that has been designated by the commission as an ETC, including a CMRS reseller.
- (c) **Service areas.** The commission may designate ETC service areas according to the following criteria.
- (1) **Non-rural service area.** To be eligible to receive federal universal service support in non-rural areas, a carrier must provide federally supported services pursuant to 47 Code of Federal Regulations (C.F.R.) §54.101 (relating to



Supported Services for Rural, Insular, and High Cost Areas) throughout the area for which the carrier seeks to be designated an ETC.

- (2) **Rural service area.** In the case of areas served by a rural telephone company, as defined in §26.404 of this title (relating to Small and Rural Incumbent Local Exchange Company (ILEC) Universal Service Plan), a carrier must provide federally supported services pursuant to 47 C.F.R. §54.101 throughout the study area of the rural telephone company in order to be eligible to receive federal universal service support.

- (d) **Criteria for determination of ETCs.** A common carrier shall be designated as eligible to receive federal universal service support if it:

- (1) offers the services that are supported by the federal universal service support mechanisms under 47 C.F.R. §54.101 either using its own facilities or a combination of its own facilities and resale of another carrier's services; and
- (2) advertises the availability of and charges for such services using media of general distribution.

- (e) **Criteria for determination of receipt of federal universal service support.** In order to receive federal universal service support, a common carrier must:

- (1) meet the requirements of subsection (d) of this section;
- (2) offer Lifeline Service to qualifying low-income consumers in compliance with 47 C.F.R. Part 54, Subpart E (relating to Universal Service Support for Low-Income Consumers); and

- (3) offer toll limitation services in accordance with 47 C.F.R. §54.400 (relating to Terms and Definitions) and §54.401 (relating to Lifeline Defined).

(f) **Designation of more than one ETC.**

- (1) Non-rural service areas. In areas not served by rural telephone companies, as defined in §26.404 of this title, the commission shall designate, upon application, more than one ETC in a service area so long as each additional carrier meets the requirements of subsection (c)(1) of this section and subsection (d) of this section.
- (2) Rural service areas. In areas served by rural telephone companies, as defined in §26.404 of this title, the commission may designate as an ETC a carrier that meets the requirements of subsection (c)(2) of this section and subsection (d) of this section if the commission finds that the designation is in the public interest.

(g) **Proceedings to designate ETCs.**

- (1) At any time, a common carrier may seek commission approval to be designated an ETC for a requested service area.
- (2) In order to receive support under this section for exchanges purchased from an unaffiliated carrier, the acquiring ETC shall file an application, within 30 days after the date of the purchase, to amend its ETC service area to include those geographic areas that are eligible for support.
- (3) If an ETC receiving support under this section sells an exchange to an unaffiliated carrier, it shall file an application, within 30 days after the date of the sale, to

amend its ETC designation to exclude from its designated service area those exchanges for which it was receiving support.

(h) **Application requirements and commission processing of applications.**

(1) **Requirements for notice and contents of application.**

(A) Notice of application. Notice shall be published in the *Texas Register*. The presiding officer may require additional notice. Unless otherwise required by the presiding officer or by law, the notice shall include at a minimum a description of the service area for which the applicant seeks eligibility, the proposed effective date of the designation, and the following statement: "Persons who wish to comment on this application should notify the Public Utility Commission of Texas by (specified date, ten days before the proposed effective date). Requests for further information should be mailed to the Public Utility Commission of Texas, P.O. Box 13326, Austin, Texas 78711-3326, or you may call the Public Utility Commission's Customer Protection Division at (512) 936-7120 or (888) 782-8477. Hearing- and speech-impaired individuals with text telephones (TTY) may contact the commission at (512) 936-7136, or use Relay Texas (800) 735-2989 to reach the commission's toll free number (888) 782-8477."

(B) Contents of application for each common carrier seeking ETC designation. A common carrier that seeks to be designated as an ETC shall file with the commission an application complying with the requirements of this

section. In addition to copies required by other commission rules, one copy of the application shall be delivered to the commission's Regulatory Division and one copy shall be delivered to the Office of Public Utility Counsel. The application shall:

- (i) show that the applicant offers each of the services that are supported by the FUSF support mechanisms under 47 U.S.C. §254(c) (relating to Universal Service) either using its own facilities or a combination of its own facilities and resale of another carrier's services throughout the service area for which it seeks designation as an ETC;
- (ii) show that the applicant assumes the obligation to offer each of the services that are supported by the FUSF support mechanisms under 47 U.S.C. §254(c) to any consumer in the service area for which it seeks designation as an ETC;
- (iii) show that the applicant advertises the availability of, and charges for, such services using media of general distribution;
- (iv) show the service area in which the applicant seeks designation as an ETC;
- (v) contain a statement detailing the method and content of the notice the applicant has provided or intends to provide to the public regarding the application and a brief statement explaining why the proposed notice is reasonable and in compliance with applicable law;

- (vi) contain a copy of the text of the notice;
  - (vii) contain the proposed effective date of the designation; and
  - (viii) contain any other information which the applicant wants considered in connection with the commission's review of its application.
- (C) Contents of application for each common carrier seeking ETC designation and receipt of federal universal service support. A common carrier that seeks to be designated as an ETC and receive federal universal service support shall file with the commission an application complying with the requirements of this section. In addition to copies required by other commission rules, one copy of the application shall be delivered to the commission staff and one copy shall be delivered to the Office of Public Utility Counsel. The application shall:
- (i) comply with the requirements of subparagraph (B) of this paragraph;
  - (ii) show that the applicant offers Lifeline Service to qualifying low-income consumers in compliance with 47 C.F.R. Part 54, Subpart E; and
  - (iii) show that the applicant offers toll limitation services in accordance with 47 C.F.R. §54.400 and §54.401.
- (2) **Commission processing of application.**
- (A) Administrative review. An application considered under this section may be reviewed administratively unless the presiding officer, for good cause,

determines at any point during the review that the application should be docketed.

- (i) The effective date shall be no earlier than 30 days after the filing date of the application or 30 days after notice is completed, whichever is later.
- (ii) The application shall be examined for sufficiency. If the presiding officer concludes that material deficiencies exist in the application, the applicant shall be notified within ten working days of the filing date of the specific deficiency in its application. The earliest possible effective date of the application shall be no less than 30 days after the filing of a sufficient application with substantially complete information as required by the presiding officer. Thereafter, any deadlines shall be determined from the 30th day after the filing of the sufficient application and information or from the effective date if the presiding officer extends that date.
- (iii) While the application is being administratively reviewed, the commission staff and the staff of the Office of Public Utility Counsel may submit requests for information to the telecommunications carrier. Three copies of all answers to such requests for information shall be provided to the commission staff and the Office of Public Utility Counsel within ten days after receipt of the request by the telecommunications carrier.

- (iv) No later than 20 days after the filing date of the application or the completion of notice, whichever is later, interested persons may provide the commission staff with written comments or recommendations concerning the application. The commission staff shall and the Office of Public Utility Counsel may file with the presiding officer written comments or recommendations regarding the application.
  - (v) No later than 35 days after the proposed effective date of the application, the presiding officer shall issue an order approving, denying, or docketing the application.
- (B) Approval or denial of application.
- (i) An application filed pursuant to paragraph (1)(B) of this subsection shall be approved by the presiding officer if the application meets the following requirements:
    - (I) the provision of service constitutes the services that are supported by the FUSF support mechanisms under 47 U.S.C. §254(c);
    - (II) the applicant will provide service using either its own facilities or a combination of its own facilities and resale of another carrier's services;
    - (III) the applicant advertises the availability of, and charges for, such services using media of general distribution;
    - (IV) notice was provided as required by this section;

- (V) the applicant satisfies the requirements contained in subsection (c) of this section; and
  - (VI) if, in areas served by a rural telephone company, the ETC designation is consistent with the public interest.
- (ii) An application filed pursuant to paragraph (1)(C) of this subsection shall be approved by the presiding officer if the application meets the following requirements:
- (I) the applicant has satisfied the requirements set forth in clause (i) of this subparagraph;
  - (II) the applicant offers Lifeline Service to qualifying low-income consumers in compliance with 47 C.F.R. Part 54, Subpart E; and
  - (III) the applicant offers toll limitation services in accordance with 47 C.F.R. §54.400 and §54.401.
- (C) Docketing. If, based on the administrative review, the presiding officer determines that one or more of the requirements have not been met, the presiding officer shall docket the application.
- (D) Review of the application after docketing. If the application is docketed, the effective date of the application shall be automatically suspended to a date 120 days after the applicant has filed all of its direct testimony and exhibits, or 155 days after the proposed effective date, whichever is later. Three copies of all answers to requests for information shall be filed with the commission within ten days after receipt of the request. Affected



persons may move to intervene in the docket, and a hearing on the merits shall be scheduled. A hearing on the merits shall be limited to issues of eligibility. The application shall be processed in accordance with the commission's rules applicable to docketed cases.

- (E) **Waiver.** In the event that an otherwise ETC requests additional time to complete the network upgrades needed to provide single-party service, access to enhanced 911 service, or toll limitation, the commission may grant a waiver of these service requirements upon a finding that exceptional circumstances prevent the carrier from providing single-party service, access to enhanced 911 service, or toll limitation. The period for the waiver shall not extend beyond the time that the commission deems necessary for that carrier to complete network upgrades to provide single-party service, access to enhanced 911 service, or toll limitation services.

- (i) **Designation of ETC for unserved areas.** If no common carrier will provide the services that are supported by federal universal service support mechanisms under 47 U.S.C. §254(c) to an unserved community or any portion thereof that requests such service, the commission, with respect to intrastate services, shall determine which common carrier or carriers are best able to provide such service to the requesting unserved community or portion thereof and shall order such carrier or carriers to provide such service for that unserved community or portion thereof.

- (j) **Relinquishment of ETC designation.** A common carrier may seek to relinquish its ETC designation.
- (1) **Area served by more than one ETC.** The commission shall permit a common carrier to relinquish its designation as an ETC in any area served by more than one ETC upon:
- (A) written notification not less than 90 days prior to the proposed effective date that the common carrier seeks to relinquish its designation as an ETC;
  - (B) determination by the commission that the remaining eligible telecommunications carrier or carriers can offer federally supported services to the relinquishing carrier's customers; and
  - (C) determination by the commission that sufficient notice of relinquishment has been provided to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier or carriers.
- (2) **Area where the common carrier is the sole ETC.** In areas where the common carrier is the only ETC, the commission may permit it to relinquish its ETC designation upon:
- (A) written notification not less than 90 days prior to the proposed effective date that the common carrier seeks to relinquish its designation as an ETC; and
  - (B) commission designation of a new ETC for the service area or areas.

- (k) **Rural and non-rural carriers' requirements for annual certification to receive FUSF support.** A common carrier serving a rural or non-rural study area shall comply with the following requirements for annual certification for the receipt of FUSF support.
- (1) **Annual certification.** Common carriers must provide the commission with an affidavit annually, on or before September 1st of each year, which certifies that the carrier is complying with the federal requirements for the receipt of FUSF support. Upon receipt and acceptance of the affidavits filed on or before September 1st each year, the commission will certify these carriers' eligibility for FUSF to the FCC and the Federal Universal Service Fund Administrator by October 1st each year.
  - (2) **Failure to file.** Common carriers failing to file an affidavit by September 1st may still be certified by the commission for annual FUSF. However, the carrier is ineligible for support until the quarter following the federal universal service administrator's receipt of the commission's supplemental submission of the carrier's compliance with the federal requirements.
  - (3) **Supplemental certification.** For carriers not subject to the annual certification process, the schedule set forth in 47 C.F.R. §54.313 and 47 C.F.R. §54.314(d) for the filing of supplemental certifications shall apply.
  - (4) **Recommendation for Revocation of FUSF support certification.** The commission may recommend the revocation of the FUSF support certification of any carrier that it determines has not complied with the federal requirements pursuant to 47 U.S.C. §254(e) and will review any challenge to a carrier's FUSF

support certification and make an appropriate recommendation as a result of any such review.

- (l) **Disaggregation of rural carriers' FUSF support.** Common carriers serving rural study areas must comply with the following requirements regarding disaggregation of FUSF support.
  - (1) **Election by May 15, 2002.** On or before May 15, 2002, all rural incumbent local exchange carriers (ILECs) may notify the commission of one of the following elections regarding FUSF support. This election will remain in place for four years from the effective date of certification, pursuant to 47 C.F.R. §54.315, unless the commission, on its own motion, or upon the motion of the rural ILEC or an interested party, requires a change to the elected disaggregation plan:
    - (A) a rural ILEC may choose to certify to the commission that it will not disaggregate at this time;
    - (B) a rural ILEC may seek disaggregation of its FUSF support by filing a targeted plan with the commission that meets the criteria in paragraph (3) of this subsection, subject to the commission's approval of the plan;
    - (C) a rural ILEC may self-certify a disaggregation targeted plan that meets the criteria in paragraphs (3) and (4) of this subsection, disaggregate support to the wire center level or up to no more than two cost zones, or mirror a plan for disaggregation that has received prior commission approval; or
    - (D) if the rural ILEC serves a study area that is served by another carrier designated as an ETC prior to the effective date of 47 C.F.R. §54.315,

(June 19, 2001), the ILEC may only self-certify the disaggregation of its FUSF support by adopting a plan for disaggregation that has received prior commission approval.

- (2) **Abstain from filing.** If a rural ILEC abstains from filing an election on or before May 15, 2002, the carrier will not be permitted to disaggregate its FUSF support unless it is ordered to do so by the commission pursuant to the terms of paragraph (5) of this subsection.
- (3) **Requirements for rural ILECs' disaggregation plans.** Pursuant to the federal requirements in 47 C.F.R. §54.315(e) a rural ILEC's disaggregation plan, whether submitted pursuant to paragraph (1)(B), (C) or (D) of this subsection, must meet the following requirements:
  - (A) the sum of the disaggregated annual support must be equal to the study area's total annual FUSF support amount without disaggregation;
  - (B) the ratio of the per line FUSF support between disaggregation zones for each disaggregated category of FUSF support shall remain fixed over time, except as changes are required pursuant to paragraph (5) of this subsection;
  - (C) the ratio of per line FUSF support shall be publicly available;
  - (D) the per line FUSF support amount for each disaggregated zone or wire center shall be recalculated whenever the rural ILEC's total annual FUSF support amount changes and revised total per line FUSF support and updated access line counts shall then be applied using the changed FUSF support amount and updated access line counts applicable at that point;

- (E) each support category complies with subparagraphs (A) and (B) of this paragraph;
  - (F) monthly payments of FUSF support shall be based upon the annual amount of FUSF support divided by 12 months if the rural ILEC's study area does not contain a competitive carrier designated as an ETC; and
  - (G) a rural ILEC's disaggregation plan methodology and the underlying access line count upon which it is based will apply to any competitive carrier designated as an ETC in the study area.
- (4) **Additional requirements for self-certification of a disaggregation plan.** Pursuant to 47 C.F.R. §54.315(d)(2), a rural ILEC's self-certified disaggregation plan must also include the following items in addition to those items required by paragraph (3) of this subsection:
- (A) support for, and a description of, the rationale used, including methods and data relied upon, as well as a discussion of how the plan meets the requirements in paragraph (3) of this subsection and this paragraph;
  - (B) a reasonable relationship between the cost of providing service for each disaggregation zone within each disaggregation category of support proposed;
  - (C) a clearly specified per-line level of FUSF support for each category pursuant to 47 C.F.R. §54.315(d)(2)(iii);
  - (D) if the plan uses a benchmark, a detailed explanation of the benchmark and how it was determined that is generally consistent with how the level of

support for each category of costs was derived so that competitive ETCs may compare the disaggregated costs for each cost zone proposed; and

(E) maps identifying the boundaries of the disaggregated zones within the study area.

(5) **Disaggregation upon commission order.** The commission on its own motion or upon the motion of an interested party may order a rural ILEC to disaggregate FUSF support under the following criteria:

(A) the commission determines that the public interest of the rural study area is best served by disaggregation of the rural ILEC's FUSF support;

(B) the commission establishes the appropriate disaggregated level of FUSF support for the rural ILEC; or

(C) changes in ownership or changes in state or federal regulation warrant the commission's action.

(6) **Effective dates of disaggregation plans.** The effective date of a rural ILEC's disaggregation plan shall be as specified in 47 C.F.R. §54.315.

This agency hereby certifies that the adoption has been reviewed by legal counsel and found to be a valid exercise of the agency's legal authority. It is therefore ordered by the Public Utility Commission of Texas that §26.418 relating to Designation of Common Carriers as Eligible Telecommunications Carriers to Receive Federal Universal Service Funds, is hereby adopted with no changes to the text as proposed.

SIGNED AT AUSTIN, TEXAS on the 16<sup>th</sup> day of November 2012.

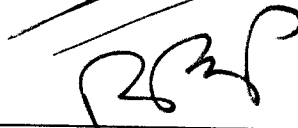
**PUBLIC UTILITY COMMISSION OF TEXAS**



**DONNA L. NELSON, CHAIRMAN**



**KENNETH W. ANDERSON, JR., COMMISSIONER**



**ROLANDO PABLOS, COMMISSIONER**



## **EXHIBIT 3**

### **Lifeline Offering**

**Q LINK WIRELESS LIFELINE OFFERING**  
**EFFECTIVE 12/1/17**

**Bundle Plan 1: 350 Minutes & 1 GB Data (Q LINK ALWAYS ON)**

350 anytime minutes per month

Unlimited text and picture messaging

1 GB data per month

*Minutes & data do not rollover*

Net cost to Lifeline customer: **\$0**

**Data-Only Plan 2: 1 GB Data**

1 GB data per month (*no rollover*)

Net cost to Lifeline customer: **\$0**

**Bundle Plan 3: 750 Minutes & 1 GB Data**

750 anytime minutes per month

Unlimited text and picture messaging

1 GB data per month

*Minutes & data do not rollover*

Net cost to Lifeline customer: **\$15 every 90 days\***

*\*Fee waived first 90 days; thereafter, if customer misses payment, customer is automatically moved to the no-cost Bundle Plan 1 (Q LINK ALWAYS ON)*

**Bundle Plan 4: 1000 Minutes & 100 MB**

1000 anytime minutes per month

Unlimited text and picture messaging

100 MB data per month

*Minutes & data do not rollover*

Net cost to Lifeline customer: **\$0**

All packages include:

- Free data-capable device
- Free calls to Q LINK Customer Service
- Free calls to 911 emergency services
- Free access to Voicemail, Caller-ID, and Call Waiting features
- Voice minutes may be used for Domestic Long Distance at no extra charge
- Data at 3G speeds or higher

**Additional airtime available for purchase**

Current rates published at <https://qlinkwireless.com/members/cart/quickpurchase.aspx>

## **EXHIBIT 4**

### **Coverage Area**

73301	75028	75080	75140	75208	75253	75363
73344	75029	75081	75141	75209	75254	75364
73430	75030	75082	75142	75210	75258	75367
73439	75032	75083	75143	75211	75260	75368
73440	75033	75085	75144	75212	75261	75370
73441	75034	75086	75146	75214	75262	75371
73446	75035	75087	75147	75215	75263	75372
73448	75037	75088	75148	75216	75264	75373
73456	75038	75089	75149	75217	75265	75374
73459	75039	75090	75150	75218	75266	75376
73463	75040	75091	75151	75219	75267	75378
73531	75041	75092	75152	75220	75270	75379
73546	75042	75093	75153	75221	75275	75380
73562	75043	75094	75154	75222	75277	75381
73565	75044	75097	75155	75223	75283	75382
73569	75045	75098	75156	75224	75284	75386
74723	75046	75099	75157	75225	75285	75387
74731	75047	75101	75158	75226	75286	75388
74733	75048	75102	75159	75227	75287	75389
74740	75049	75103	75160	75228	75301	75390
74741	75050	75104	75161	75229	75303	75391
74745	75051	75105	75163	75230	75310	75392
75001	75052	75106	75164	75231	75312	75393
75002	75053	75109	75165	75232	75313	75394
75006	75054	75110	75166	75233	75315	75395
75007	75056	75114	75167	75234	75320	75396
75009	75057	75115	75168	75235	75323	75397
75010	75058	75116	75169	75236	75326	75398
75011	75060	75117	75172	75237	75334	75401
75013	75061	75118	75173	75238	75336	75402
75014	75062	75119	75180	75240	75339	75403
75015	75063	75120	75181	75241	75340	75404
75016	75065	75121	75182	75242	75342	75407
75017	75067	75123	75185	75243	75343	75409
75019	75068	75124	75187	75244	75344	75410
75020	75069	75125	75189	75245	75353	75412
75021	75070	75126	75201	75246	75354	75413
75022	75071	75127	75202	75247	75355	75414
75023	75074	75132	75203	75248	75356	75415
75024	75075	75134	75204	75249	75357	75416
75025	75076	75135	75205	75250	75358	75417
75026	75077	75137	75206	75251	75359	75418
75027	75078	75138	75207	75252	75360	75420

75421	75474	75568	75663	75759	75853	75960
75422	75475	75569	75666	75760	75855	75961
75423	75476	75570	75667	75762	75856	75962
75424	75477	75571	75668	75763	75858	75963
75426	75478	75572	75669	75764	75859	75964
75428	75479	75573	75670	75765	75860	75965
75429	75480	75574	75671	75766	75861	75966
75431	75481	75599	75672	75770	75862	75968
75432	75482	75601	75680	75771	75865	75969
75433	75483	75602	75681	75772	75880	75972
75435	75485	75603	75682	75773	75884	75973
75436	75486	75604	75683	75778	75886	75974
75437	75487	75605	75684	75779	75901	75975
75438	75488	75606	75685	75780	75902	75976
75439	75489	75607	75686	75782	75903	75977
75440	75490	75608	75687	75783	75904	75978
75441	75491	75615	75688	75784	75915	75979
75442	75492	75630	75689	75785	75925	75980
75443	75493	75631	75691	75788	75926	75990
75444	75494	75633	75692	75789	75928	76001
75446	75495	75636	75693	75790	75929	76002
75447	75496	75637	75694	75791	75930	76003
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75453	75507	75643	75706	75803	75936	76009
75454	75550	75644	75707	75831	75937	76010
75455	75551	75645	75708	75833	75938	76011
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75457	75555	75650	75710	75835	75941	76013
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75459	75558	75652	75712	75839	75943	76015
75460	75559	75653	75713	75840	75944	76016
75461	75560	75654	75750	75844	75946	76017
75462	75561	75656	75751	75845	75948	76018
75468	75562	75657	75752	75846	75949	76019
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75470	75564	75659	75755	75848	75954	76021
75471	75565	75660	75756	75850	75956	76022
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76035	76099	76163	76248	76373	76466	76541
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76040	76103	76177	76251	76379	76469	76544
76041	76104	76179	76252	76380	76470	76545
76043	76105	76180	76253	76384	76471	76546
76044	76106	76181	76255	76385	76472	76547
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76049	76108	76185	76259	76389	76475	76549
76050	76109	76190	76261	76401	76476	76550
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76053	76112	76193	76264	76426	76485	76557
76054	76113	76195	76265	76427	76486	76558
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76065	76121	76204	76299	76437	76505	76570
76066	76122	76205	76301	76439	76508	76571
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76068	76124	76207	76305	76443	76513	76574
76070	76126	76208	76306	76444	76518	76577
76071	76127	76209	76307	76445	76519	76578
76073	76129	76210	76308	76446	76520	76579
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76084	76133	76228	76351	76453	76525	76599
76085	76134	76230	76354	76454	76526	76621
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76092	76140	76239	76365	76459	76531	76626
76093	76147	76240	76366	76460	76533	76627
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76095	76150	76244	76369	76462	76537	76629

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76636	76703	76866	77003	77046	77089	77236
76637	76704	76871	77004	77047	77090	77237
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76641	76708	76875	77008	77051	77094	77242
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76643	76711	76878	77010	77053	77096	77244
76645	76712	76880	77011	77054	77097	77245
76648	76714	76882	77012	77055	77098	77246
76649	76715	76884	77013	77056	77099	77247
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76676	76836	76936	77030	77073	77219	77265
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77279	77342	77389	77450	77497	77555	77627
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77288	77349	77404	77457	77506	77566	77641
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77291	77353	77410	77460	77510	77572	77650
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77294	77356	77413	77464	77514	77575	77656
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77297	77358	77415	77466	77516	77578	77659
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77331	77378	77437	77484	77541	77613	77710
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78406	78523	78583	78632	78681	78744	78828
78407	78526	78584	78633	78682	78745	78829
78408	78535	78585	78634	78683	78746	78830
78409	78536	78586	78635	78691	78747	78832
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78413	78540	78591	78640	78704	78751	78838
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78860	79016	79097	79241	79363	79501	79567
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78870	79019	79101	79244	79366	79503	79602
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78877	79022	79103	79247	79369	79506	79604
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78942	79053	79119	79316	79402	79529	79706
78943	79057	79120	79320	79403	79530	79707
78944	79058	79121	79322	79404	79532	79708
78945	79059	79124	79323	79405	79533	79710
78946	79061	79159	79324	79406	79534	79711
78947	79063	79166	79325	79407	79535	79712
78948	79064	79168	79326	79408	79536	79713
78949	79065	79172	79329	79409	79538	79714
78950	79066	79174	79330	79410	79539	79718
78952	79068	79178	79331	79411	79541	79719
78953	79072	79185	79336	79412	79543	79720
78954	79073	79189	79338	79413	79544	79721
78956	79078	79201	79339	79414	79545	79730
78957	79079	79220	79342	79415	79546	79731
78959	79080	79221	79343	79416	79547	79733
78960	79082	79223	79345	79423	79548	79734
78962	79083	79225	79346	79424	79549	79735
78963	79084	79226	79347	79430	79550	79738
79001	79085	79227	79350	79452	79553	79739
79002	79086	79229	79351	79453	79556	79740
79007	79088	79231	79355	79457	79560	79741
79008	79091	79233	79356	79464	79561	79742
79009	79092	79235	79357	79490	79562	79743

79744	79902	79950	88516	88563
79745	79903	79951	88517	88565
79748	79904	79952	88518	88566
79749	79905	79953	88519	88567
79752	79906	79954	88520	88568
79754	79907	79955	88521	88569
79755	79908	79958	88523	88570
79756	79910	79960	88524	88571
79758	79911	79961	88525	88572
79759	79912	79968	88526	88573
79760	79913	79976	88527	88574
79761	79914	79978	88528	88575
79762	79915	79980	88529	88576
79763	79916	79990	88530	88577
79764	79917	79995	88531	88578
79765	79918	79996	88532	88579
79766	79920	79997	88533	88580
79768	79922	79998	88534	88581
79769	79923	79999	88535	88582
79772	79924	88002	88536	88583
79776	79925	88005	88538	88584
79777	79926	88008	88539	88585
79778	79927	88021	88540	88586
79780	79928	88024	88541	88587
79781	79929	88030	88542	88588
79782	79930	88044	88543	88589
79783	79931	88048	88544	88590
79785	79932	88063	88545	88595
79788	79934	88072	88546	
79789	79935	88081	88547	
79821	79936	88231	88548	
79835	79937	88252	88549	
79836	79938	88310	88550	
79837	79940	88317	88553	
79838	79941	88342	88554	
79839	79942	88426	88555	
79847	79943	88430	88556	
79849	79944	88510	88557	
79851	79945	88511	88558	
79853	79946	88512	88559	
79854	79947	88513	88560	
79855	79948	88514	88561	
79901	79949	88515	88562	

## **EXHIBIT 5**

### **Sample Advertisement**



GOVERNMENT  
BENEFIT PROGRAM

# FREE SMARTPHONE *with*

FREE MONTHLY  
PLAN THAT  
INCLUDES:

- ✓ 1GB of FREE Data
- ✓ 350 FREE Minutes
- ✓ UNLIMITED Texts



FREE PHONE  
FREE MINUTES  
NO BILLS  
NO CONTRACT  
NO FEES

**GET YOURS ►**

**QLINK**  
WIRELESS

Must be eligible to enroll.

[Click to view disclosures](#)

Q Link Wireless is a provider of Lifeline, a non-transferable federal benefit program. You must be eligible to enroll. Lifeline support is limited to one per household on wireline, wireless, or broadband service. If your household's income is at or below 135 percent of the federal poverty guidelines, or if you participate in a qualifying federal assistance program, you may be eligible for a Lifeline Program discount. Proof of eligibility will be required during enrollment. To view terms visit <http://www.qlinkwireless.com>

**GOVERNMENT BENEFIT PROGRAM**

**FREE SMARTPHONE**  
**1GB OF FREE DATA**  
**EVERY MONTH**

**+ PLUS**

✓ **350 Monthly Minutes**  
✓ **UNLIMITED Texting**

**GET YOURS >**

**Q LINK**  
Must be eligible to enroll.  
[Click to view disclosures](#)

**NO CREDIT CHECKS NO FEES NO MONTHLY BILLS**

Q Link Wireless is a provider of Lifeline, a non-transferable federal benefit program. You must be eligible to enroll. Lifeline support is limited to one per household on wireline, wireless, or broadband service. If your household's income is at or below 135 percent of the federal poverty guidelines, or if you participate in a qualifying federal assistance program, you may be eligible for a Lifeline Program discount. Proof of eligibility will be required during enrollment. To view terms visit <http://www.qlinkwireless.com>

# FREE SMARTPHONE *with* FREE MONTHLY SERVICE

1GB OF MONTHLY DATA + 350 MONTHLY MINUTES + UNLIMITED TEXTING



QLINK  
WIRELESS

**GET YOURS NOW!**

Must be eligible to enroll. [Click to view disclosures](#)

Q Link Wireless is a provider of Lifeline, a non-transferable federal benefit program. You must be eligible to enroll. Lifeline support is limited to one per household on wireline, wireless, or broadband service. If your household's income is at or below 135 percent of the federal poverty guidelines, or if you participate in a qualifying federal assistance program, you may be eligible for a Lifeline Program discount. Proof of eligibility will be required during enrollment. To view terms visit <http://www qlinkwireless.com>



**EXHIBIT 6**

**Sample Lifeline Certification Form**

# Facts and Information about the Lifeline Program

## Free Cell Phone and Monthly Service for Eligible Low-Income Applicants

### What is the Lifeline Program?

Lifeline is a government benefit program that provides a monthly benefit limited to ONE per household on wireline, wireless, or broadband service for eligible low-income consumers. The Lifeline Program helps qualified applicants to stay in touch with family, friends, job opportunities, health care, or for use in case of emergencies.

Lifeline service through Q Link Wireless is available to eligible low-income consumers in approved states, territories, commonwealths, and on tribal lands. Q Link Wireless offers eligible consumers a free cell phone to use with the free monthly service.\* The free cell phones feature voicemail, call waiting, caller ID, 911 emergency calls, and nationwide coverage.

*\*Plans may vary by state.*

### Important facts to know about Lifeline:

You are certifying and agreeing under penalty of perjury Under title 18 U.S.C. § 1621, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both and can be barred from the program.

- Lifeline is available **only to eligible** consumers.
- Lifeline service is a **non-transferable benefit** and the subscriber may not transfer his or her benefit to any other person.
- **Only one Lifeline benefit is permitted per person and per household.** Violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in the consumer's de-enrollment from the program, and potentially, prosecution by the United States government.
- Only low-income consumers with proof of eligibility are qualified to enroll.
- You must use your Lifeline phone at least once every 30 days in order to keep your service active.
- Those enrolled **must recertify their eligibility** for the Lifeline program once every year and should respond to Q Link Wireless' requests to recertify.
- If you **become ineligible for Lifeline** for any reason, you must contact Q Link Wireless within 30 days to de-enroll from the program.

## Lifeline Assistance Application

### Am I eligible for the Lifeline Program?

To participate in Lifeline, you must have an income that is at or below 135% of the federal Poverty Guidelines OR currently participate in one of the following government assistance programs:

- Food Stamps or SNAP
- Medicaid
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- Veterans Pension or Survivors Pension Program
- Bureau of Indian Affairs General Assistance
- Tribally-Administered Temporary Assistance for Needy Families (TTANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Head Start on Tribal Lands (if income eligibility criteria are met)

### How do I prove my eligibility?

To receive Lifeline, you must provide documentation that proves you or your dependent participates in a qualifying program OR meets the income qualifications for Lifeline eligibility. The most common types of proof are provided on pages 1 and 2 of this application.

### Do I need to recertify my eligibility every year?

Yes. All active Lifeline subscribers must recertify their continued eligibility for the program once each year.

Q Link Wireless will provide you with easy ways to recertify for the Lifeline program and remind you via phone, text, email, and postcard. You must complete the free Annual Recertification process, or you will be de-enrolled from Lifeline service.

### What is the definition of a household?

A "household" is defined, for purposes of the Lifeline program as "any individual or group of individuals who live together at the same address and share income and expenses." Lifeline provides one account per household. For a full definition of a household, please reference the Household Worksheet.

### What If I already have Lifeline service?

You are eligible to transfer your service to Q Link Wireless if (a) you have voice service and have been with your service provider for 60 days or more, or (b) you have broadband service and have been with your service provider for 12 months or more. Transferring service to Q Link Wireless will initiate a new port freeze period of 12 months. Upon signing up for Q Link Wireless, you agree to select Q Link Wireless as your sole Lifeline provider.

**X**

APPLICANT SIGNATURE

DATE



# Lifeline Assistance Application

- Lifeline service is available for only one line per household.\*
- A household\* cannot receive benefits from multiple providers.
- Lifeline is a federal non-transferable benefit.\*\* Must be eligible to enroll.

## A Personal Information

Please make sure that you provide correct information. Your information will be verified against public records and any discrepancies may result in delays in your approval or rejection of Lifeline service. PLEASE PRINT.

First Name: \_\_\_\_\_ Last Name: \_\_\_\_\_ MI: \_\_\_\_\_  
Street Address: \_\_\_\_\_ Address Line 2: \_\_\_\_\_ ☐ Check here if your address is temporary  
Residence Address (No P.O. Boxes, must be your principal address)  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Contact Number: (\_\_\_\_) \_\_\_\_\_ Other Number: (\_\_\_\_) \_\_\_\_\_ Birth Date: \_\_\_\_/\_\_\_\_/\_\_\_\_ (MM/DD/YYYY)  
Email Address: \_\_\_\_\_ Social Security Number: \_\_\_\_\_

Complete this part ONLY if your child or dependent is the beneficiary of the qualifying program.

First Name: \_\_\_\_\_ Last Name: \_\_\_\_\_ Birth Date (MM/DD/YYYY) \_\_\_\_\_ Social Security Number \_\_\_\_\_

Enrollment ID:

## B Select Your FREE Plan Below (Includes a FREE Cell Phone)

All Plans Include: A FREE PHONE, Local Calls, National Long Distance, Voicemail, Nationwide Text, Roaming & Free 911

- ☐ **ALWAYS ON PLAN** Most Popular!
- 1GB of Data
  - 350 Minutes
  - UNLIMITED Text Messages

Tribal plans may vary depending on the state you live in. To learn more about tribal plans visit us online at [www.qlinkwireless.com](http://www.qlinkwireless.com).

## C Consent to Transfer Existing Benefit

- ☐ **Check this box if you have existing service with another Lifeline provider and are transferring to Q Link Wireless**  
By checking this box I am agreeing to transfer my existing Lifeline Program benefit to Q Link Wireless, which will result in changing my current Lifeline phone number, service, and provider. I acknowledge that I may not have multiple Lifeline Program benefits with the same or different providers.

## D Do You Participate in Any Government Assistance Programs?

- ☐ **YES, I Participate in One or More Government Assistance Programs**  
(Check off all that apply below)
- ☐ **NO, I Do Not Participate in Any Government Assistance Programs**  
(You may qualify based on your income. Continue to Section E on the back)

**I certify that I participate in at least one of the government assistance programs listed below (Check all that apply):**

- ☐ Food Stamps / Supplemental Nutrition Assistance Program (SNAP) ☐ Federal Public Housing Assistance or Section 8  
☐ Medicaid ☐ Veterans Pension or Survivors Pension  
☐ Supplemental Security Income (SSI)

➔ **Get your FREE Phone FASTER:**

Enter the last 4 digits of your Government Assistance Program: Case or Claim Number, Program ID, or Card Number. (this is optional)



**You Must Provide Proof of Participation in One of the Programs Listed Above.**

*The most common types of government proof include:*

- SNAP/Food Stamps
- Medicaid Card
- A Benefits Statement (current or prior year)
- An Eligibility Letter from an Authorized Agency
- Your Benefit ID Card
- Other Participation Document

\* A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses. View the back of this application for the full definition of a household.

\*\* Lifeline service is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

## E If You Participate in a Government Program, Skip This Part and Go to Section F

You may qualify for your **FREE Phone** based on your state's income guidelines. Refer to the chart below.

People in Household	Max Annual Income	Max Monthly Income
1	\$16,281	\$1,357
2	\$21,924	\$1,827
3	\$27,567	\$2,297
4	\$33,210	\$2,768
5	\$38,853	\$3,238
6	\$44,496	\$3,708
7	\$50,139	\$4,178
8	\$55,782	\$4,649
For each additional person, add	\$5,643	\$470

This chart is based on 2017 Federal Poverty Guidelines, which may vary by state and are subject to change.

### ONLY ANSWER THE QUESTIONS BELOW TO QUALIFY BASED ON YOUR HOUSEHOLD INCOME

Number of people in your household: \_\_\_\_\_ Number of children under the age of 18: \_\_\_\_\_  
Number of people receiving income: \_\_\_\_\_ Your total household income: \_\_\_\_\_ OR \_\_\_\_\_ OR \_\_\_\_\_  
Annual Income Monthly Income Weekly Income



### You **Must** Provide Proof to Qualify Based on Your Income

*The most common types of income proof include:*

- Current Paycheck Stub or Income Statement From Employer
- Retirement or Pension Statement of Benefits
- Social Security or Veterans Administration (VA) Statement of Benefits
- Prior Year State or Federal Tax Return or W2
- Unemployment or Workers' Comp Statement of Benefits
- Child Support Award or Divorce Decree

## F Penalty of Perjury - You **MUST** Check ALL of the Boxes Below

**I certify and agree, under penalty of perjury, to each of the following (MUST CHECK ALL BOXES BELOW):**

Under title 18 U.S.C. § 1621, whoever willfully states as true any material matter which he does not believe to be true in a statement under penalty of perjury, is guilty of perjury and shall, except as otherwise expressly provided by law, be fined or imprisoned not more than five years, or both and can be barred from the program.

- ☐ I participate in the above designated qualifying program or have income at or below the level specified above and will provide documentation of eligibility if required to do so.
- ☐ I understand that I must notify Q Link Wireless within 30 days if I no longer participate in the qualifying program or no longer meet the income criteria, if I or another member of my household obtains Lifeline service from another carrier; or, for any other reason, I no longer qualify for Lifeline. I acknowledge that I may not have multiple Lifeline Program benefits with the same or different providers.
- ☐ I understand I may be required to recertify my continued eligibility for Lifeline at any time, and failure to do so will result in termination of my Lifeline benefits. I am required to use my Q Link phone at least once every 30 days, or my service will be suspended, subject to a 15 day period which I may use the service or contact Q Link Wireless to confirm that I want to continue receiving their service.
- ☐ If I change my address, I will provide my new address to Q Link Wireless within 30 days.
- ☐ My household will receive only one Lifeline benefit and to the best of my knowledge, my household and/or spouse does not already receive a Lifeline service. I do not share living expenses and income with any other adult who currently resides at my address and is receiving Lifeline service. Violation of the one-per-household requirement would constitute a violation of the Commission's rules and would result in de-enrollment from the program, and potentially, prosecution by the United States government. I also understand that this is a non-transferable service.
- ☐ The information contained in this application is true and accurate to the best of my knowledge, and I acknowledge that providing false or fraudulent information to obtain Lifeline benefits is punishable by law. I understand that the date of my application shall be based upon when I became eligible to receive service at provider's sole discretion.
- ☐ I authorize Q Link Wireless or its duly appointed representative to: (1) access any records to verify my statements herein; (2) to confirm my continued eligibility for Lifeline; (3) to update my address to a proper format; (4) to provide any and all of the information related to my account including but not limited to my name and address to the Universal Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I only receive one Lifeline benefit; and (5) authorize social service agency representatives to discuss with and/or provide information to Q Link Wireless verifying my participation in benefit program(s) that qualifies me for Lifeline assistance. If USAC identifies I am receiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-enrolled from the other. I agree to transfer my existing Lifeline Program benefit to Q Link Wireless which will result in changing my current Lifeline phone number, service and provider. I also authorize Q Link Wireless to de-enroll my existing service and choose Q Link Wireless as my sole Lifeline provider.

**IMPORTANT: Make sure to include a copy of your proof of participation in a government program OR your proof of income.**

## G Sign and Date Below - By writing or typing your full name, you are electronically signing this form.

**X**

APPLICANT SIGNATURE

DATE

To apply online, visit: [www qlinkwireless.com](http://www qlinkwireless.com). For questions, visit our online Help Center at [www qlinkwireless.com](http://www qlinkwireless.com), or call us toll-free at 1-855-754-6543.

*Due to federal, state, and local guidelines, Terms and Conditions are subject to change without notice.*



## Lifeline Household Worksheet

Full Name:			
Address:			
Apt/Unit:		City:	
State:		Zip:	
Phone:			
Enrollment ID:			

Lifeline is a government program that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. Members of a household are not permitted to receive Lifeline service from multiple telephone companies.

Your **household** is everyone who lives together at your address as one economic unit (including children and people who are not related to you).

The **adults** you live with are part of your **economic unit** if they contribute to and share in the income and expenses of the household. An **adult** is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household **expenses** include food, health care expenses (such as medical bills) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). **Income** includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.

Spouses and domestic partners are considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered to be part of the same household as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support to that adult, both people are considered part of the same household.

**You have been asked to complete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This other person may or may not be a part of your household. Answer the questions below to determine whether there is more than one household residing at your address.**

### Answer the Following Questions About Your Household

1. Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)

☐ YES ☐ NO

*If you checked YES, you may not sign up for the Lifeline program. Only ONE Lifeline discount is allowed per household.  
If you checked NO, please answer question #2.*

2. Other than a spouse or partner, do other **adults, (people over the age of 18 or emancipated minors)** live with you at your address?  
This could include: parents, adult children, another adult relative such as a sibling, aunt, cousin, grandparent, grandchild, etc. or an adult roommate.

☐ YES ☐ NO

*If you checked NO, initial below by Line B, and sign and date the worksheet  
If you checked YES, please answer question #3.*

3. Other than a spouse or partner, do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?

☐ YES ☐ NO

*If you checked NO, then initial lines A and B below, and sign and date the worksheet  
If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline.*

### CERTIFICATION

➔ Please initial the certifications below and sign and date this worksheet. Submit this worksheet to Q Link Wireless along with your Lifeline application.

A. ☐ I certify that I live at an address occupied by multiple households.

B. ☐ I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

**SIGN AND DATE** - By writing or typing your full name, you are electronically signing this form.

X

APPLICANT SIGNATURE

DATE

**You must submit this completed household worksheet with your Q Link Wireless Lifeline application.**



Email to: documents@qlinkwireless.com  
Fax to: 1-855-837-5465

-OR-



Mail to: Q Link Wireless, LLC  
499 E SHERIDAN ST, STE 300  
DANIA, FLORIDA 33004

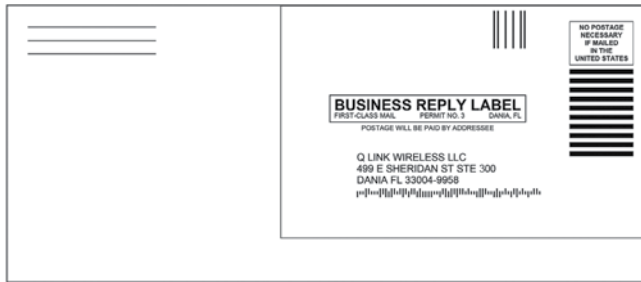


#### IMPORTANT:

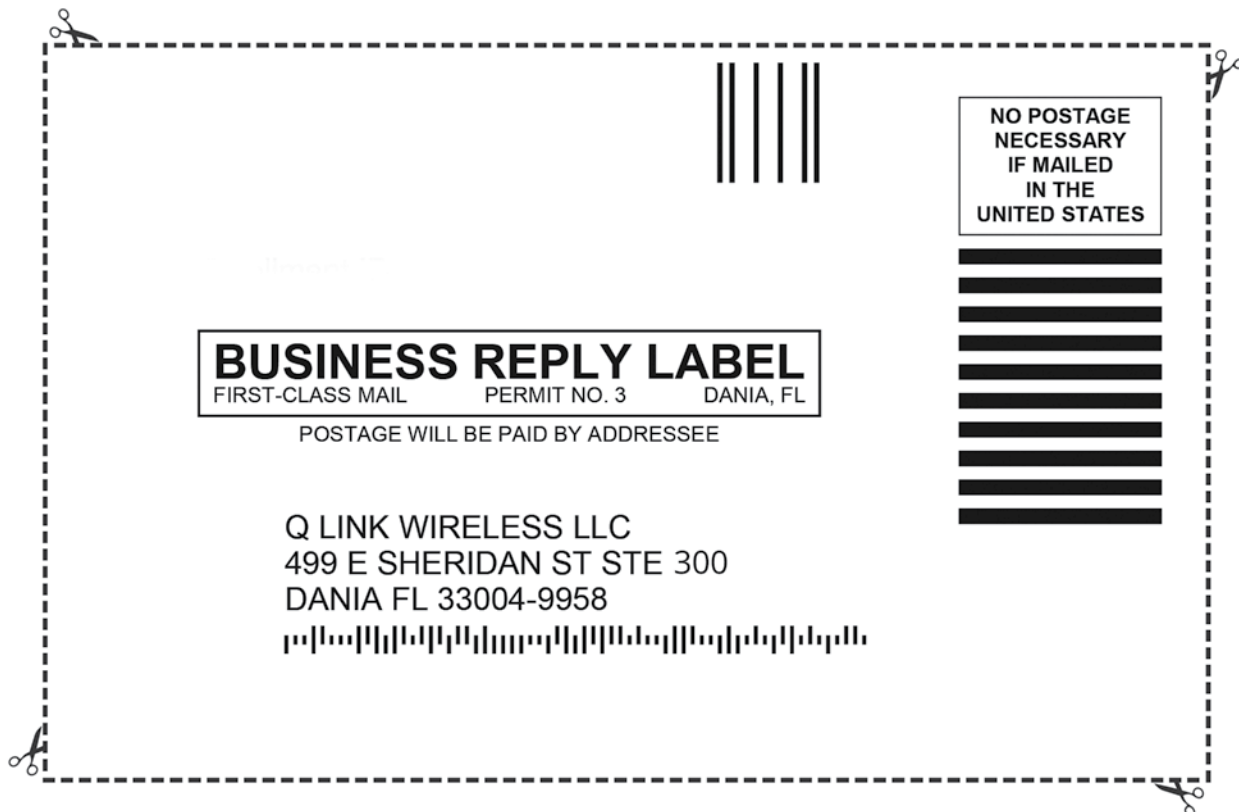
We cannot send your free phone unless you submit a copy of your proof of identity AND either proof of participation in a government program or proof of your income.

### How to Mail Proof of Eligibility

1. Print out the prepaid mailing label. **\*PRINT AT 100%. DO NOT SCALE TO FIT.**
2. Cut around the dotted line of the mailing label and affix it on the top right corner of the envelope, as shown below.



3. Make sure to include one copy of your **proof of identity** AND either **proof of participation in a government program** or **proof of your income**.
4. **Mail** the required documents to us for free using the prepaid label below!



1. Print label.
2. Cut and affix label to envelope.
3. Mail envelope with your documents.

## **EXHIBIT 7**

### **Key Management Bios**

# ISSA ASAD

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## PROFESSIONAL BIOGRAPHY

Issa Asad is an experienced entrepreneur, businessman, and marketing strategist residing in the Dania Beach, Florida area. With over 20 years of experience in telecommunications, marketing, and technology industries, Issa's companies have produced continuous yearly profit growth in highly competitive domestic and international markets. He is the Founder, Managing Member, Chief Executive Officer and President of several telecom and technology companies, most recently Quadrant Holdings, LLC (founded 2011); Q Link Wireless, LLC a subsidiary of Quadrant Holdings (founded 2011); and Reliable Telecard (founded 1998).

Before devoting himself to the telecom industry, Issa was an entrepreneur from the start. He began in retail at the early age of 24 as owner, operator, and developer of convenience stores and gas stations across New York and Florida. With vision and entrepreneurial spirit, he was the first gas station owner to offer fast food in his network of privately owned stores, beginning with Fine Foods Supermarkets in Miami, Florida. As President and CEO of the South Florida Grocers Association, Issa led the industry to incorporate Point of Sale, Cashless ATMs, Prepaid Calling Cards and check cashing services within grocery stores and gas stations.

Issa's career shifted into the telecom industry in the late 1990s, when he noticed an unexplored opportunity to provide prepaid phone cards for low-income Americans with families abroad. Issa began selling phone cards in his stores, and in the spring of 2000, he revolutionized the entire prepaid phone card industry when he founded Reliable Telecard and co-founded I-Prepay Inc. Under Issa's leadership, these companies were the first to use touch-screen technology to develop and successfully distribute a real-time PIN delivery system with electronic point-of-sale solutions and physical distribution of phone cards, prepaid wireless products, bill payment processing, and other digital services.

The I-Prepay technology set the industry standard for the distribution of prepaid telecommunication services and products, and catalyzed a complete market restructuring, leading to record sales, revenues, and growth of the industry as a whole. Issa's own unparalleled telecom marketing victories followed. With his passionate and strategic professional vision, he founded and helmed several of the nation's most esteemed telecom, technology, and Internet companies.

Issa's recent achievements include his sweeping success as CEO and founder of Q Link Wireless, Managing Member of Quadrant Holdings, and President of QLixar Mobile Advertising Company. In only 6 years, Issa has directed Q Link Wireless to become the third largest Lifeline provider in the United States, is fully self-funded with zero debt, and services approximately 2.4 million customers nationwide.

Issa has been featured in many technology-based publications. *Intelecard News* profiled Issa as a telecommunications executive with "real vision" and the *Prepaid Press* newspaper featured Issa as a "Telecom Mover of the Month" and labeled him as a "playmaker"—one of the "top telecommunications executives" in United States. He has also been recognized by *Who's Who in Telecom*, has authored several books, owns a variety of social media and e-commerce marketing blogs, and has been highlighted in several news publications for his ongoing commitment to both customers and community.



# ISSA ASAD

E-mail: [issa@quadrantholdings.com](mailto:issa@quadrantholdings.com)

499 E Sheridan St, Suite 400

Dania, FL 33004

## SENIOR EXECUTIVE SUMMARY

Entrepreneur and senior sales executive with 18-year accomplished track record and known throughout the prepaid and telecom industry for delivering and sustaining revenue and profit gains with highly competitive domestic and international prepaid products, including domestic and international prepaid telephone and wireless calling cards and national distribution channels markets. By age 30, had pioneered what is now a multi-hundred million dollar a year prepaid industry. Practical experience in and solid understanding of a diverse range of business management applications, including market analysis, sales and marketing, team-building and quality assurance. Demonstrated ability to select, train and retain self-motivated customer-oriented employees. Exceptional problem-solving skills, keen client needs assessment aptitude, high-caliber presentation, negotiation and closing skills.

Strategic & Tactical Planning  
Mergers & Acquisition  
Strategic Partnerships & Alliance  
Broker & Vendor Relations

Business Expansion & Startups  
Staff Management & Development  
Sales Presentations & Closing  
Account Development & Acquisition

## PROFESSIONAL EXPERIENCE

### QUADRANT HOLDINGS GROUP, LLC – DANIA, FL

**Managing Member**, January 2011 - Present

Quadrant Holdings serves as the Managing Member entity of Q Link Wireless, LLC., and other telecom companies.

### Q LINK WIRELESS, LLC – DANIA, FL

**Founder and CEO**, January 2011 - Present

Q Link Wireless, LLC., is the third largest provider of government assisted wireless service nationwide, offering prepaid wireless and discounted Lifeline phone service to low income families and individuals, ensuring vulnerable populations have consistent and reliable phone service with 24-hour access to manned 911 operators. In-house technology infrastructure integrates directly with Sprint's network to offer consumers industry-leading service worldwide. Q Link Wireless provides quality wireless service and customer support to approximately 2.4 million customers. Q Link Wireless serves as the Managing Member entity of QLixar Incorporation a mobile advertising company.

- Developed and evolves sales model, including strategy, process, partnerships, organization, and execution to deliver financial and market share goals and achieve sustained profitable growth
- Established direct working relationships with fortune 500 companies such as Facebook, Google, and Bing to reach consumers in un-serviced areas of the market, resulting in 85% of its enrollees being new to the Lifeline program.
- Self-funded Q Link Wireless, and carries no company debt
- Built, trained, and managed results-orientated staff of high-level managers to oversee sales, marketing, compliance, shipping, technology, and a customer service team of over 150 dedicated employees providing live in-house support via phone, email, chat, and social media.
- Architected and manages the industry's most sophisticated Lifeline technology platform, with an expert team of in-house coders and developers.

## **PROFESSIONAL EXPERIENCE (Cont'd)**

### **RELIABLE TELECARD – MIAMI, FL**

**CEO, President and Founder, 2000 - 2016**

A leading provider of wholesale and retail telecommunications services. Reliable Telecard uses its own network infrastructure to route calls worldwide. The company's prepaid retail cards (topping 100 brands) are available at over 250,000 points of sale nationwide.

- Grew and maintained client base of 9,000 distributors and 300 worldwide outlets
- Managed a staff of 150 employees
- Gross annual revenues exceeding \$50M

### **IPREPAY, INC. – MIAMI, FL**

**VP of Sales & Co-Founder, January 2000 - 2008**

Provided wholesale long distance, prepaid point of sale services including prepaid wireless, prepaid calling cards, bill pay, FTD flowers, Prepaid Visa Card, Prepaid Discover Card and an array of stored value products and services for carriers and end-users.

- Developed and evolved the sales model including strategy, process, partnerships, organization, and execution to deliver financial and market share goals and achieve sustained profitable growth
- Recruited, trained and managed results-orientated staff of professional managers to oversee sales and marketing efforts
- Increased 2004 gross revenues from \$20M to 2006 run-rate of \$75M.

### **X CHANGE COMMUNICATIONS – MIAMI, FL**

**Strategic Business Partner, 2000 - 2008**

Powerhouse Company with over 150 employees in a 40,000 square foot office campus in Miami, Florida. X Change was capable of handling 8 billion calling minutes per month through a state of the art system, completely designed and developed by strategic partners and X Change's in-house software engineers.

- Facilitated partnership with top carriers
- 1<sup>st</sup> year partnership revenues exceeded \$85M

### **PREPAID TECHNOLOGIES – MIAMI, FL**

**CEO, President and Founder, 1996 - 2001**

Prepaid Technologies aligned with qualified national processors and issued cards through a variety of national banks. Prepaid Technologies provided host-based stored value cards that were packaged and marketed as gift cards, travel cards, payroll cards, incentive reward cards, student cards, e-cards, vendor payment cards, and expense cards.

- Responsible for securing national prepaid distribution channels
- 1<sup>st</sup> year profits exceeding \$600K

### **WORLD.COM – MIAMI, FL**

**Director of Sales, 1995 - 1996**

Facilities-based network operator managed one of the world's largest communications network systems. One of the largest carriers of international voice traffic operating a leading Internet protocol backbone system.

- Secured exclusive prepaid phone card deal with Michael Jordon generating over \$1B in gross revenues with over \$350M in revenues during the 1<sup>st</sup> year

## **FINE FOODS SUPERMARKETS – MIAMI, FL**

**CEO, President and Founder, 1991 - 1999**

- Designed, developed, opened and maintained 12 retail chain grocery stores

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## **PUBLICATIONS**

Asad, Issa. (2014) *Instant Profits with Alibaba: Cash in On the World's Largest Economy – China*

Asad, Issa. (2014) *Instant Profits with Instagram: Build Your Brand, Explode Your Business.*

Asad, Issa. (2014) *Instant Profits with Snapchat: How to Use Snaps to Boost Your Sales Fast*

Asad, Issa. (2014) *Instant Profits with Vine: How to Grow Your Business in Just 6 Seconds*

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## **MEDIA RECOGNITION**

### **NEWS:**

Sun Sentinel News

CBS Miami

7 News Miami

Highlighted for Hurricane Harvey Relief Efforts

Highlighted for Hurricane Harvey Relief Efforts

Highlighted for Hurricane Harvey Relief Efforts

Sept 1<sup>st</sup> 2017

Aug 29<sup>th</sup> 2017

Aug 29<sup>th</sup> 2017

### **MAGAZINE:**

Intele-Card News Magazine

Phone Plus

Convenience Store Decisions

Convenience Store News

Vending Times

Acknowledged and interviewed in 48 issues since 2000.

Acknowledged and interviewed in 10 issues since 2002.

Acknowledged and interviewed in both 1997 and 1998.

Acknowledged and interviewed in both 1997 and 1998.

Acknowledged and interviewed in 1995.

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## **EDUCATION**

### **UNIVERISTY OF MIAMI – MIAMI, FL**

B.S. Science

A.A. Business Management

### **FLORIDA INTERNATIONAL UNIVERSITY – MIAMI, FL**

A.A. Physiology

**RAFAEL CARVAJAL**  
**Chief Operating Officer & Acting CFO**  
**Q Link Wireless**

**Professional Experience**

- Results-driven executive experienced in general management, finance, strategic planning, business development, startup operations, mergers and acquisitions, and investment banking.
- Chief Operating Officer of an international telecommunications company with \$125 million in revenues and 85 employees. Directed, controlled, planned, and organized the day-to-day operations of all business units. Restructured operations to increase profits. Identified and focused on the most profitable customers, personnel, and reducing fixed costs. Managed all corporate functions, including operations, finance, sales, procurement, strategic planning, human resources, and legal.
- Built Telefónica S.A.'s global Internet B2B organization to develop/manage Internet B2B solutions and provide e-business professional services to corporate clients. 400 employees and a personnel budget of \$17 million. Managed multinational operations in the U.S., Spain, Mexico, Brazil, and Argentina, and all U.S. financial and administrative activities, including treasury, accounts payable, and expenses control. Approved and helped develop all strategic initiatives, business plans, and budgets. As senior executive in charge of managing all human resources worldwide, led and managed a corporate organization and local teams in each country of operations, and was responsible for organizational definition and structure and all recruiting and hiring worldwide.
- Operated at senior executive levels within the Telefónica Group to support other lines of business. Assessed and revamped the strategy of Telefónica's \$400 million data communications business in Latin America. Helped develop a new strategy to generate \$1 billion in revenues for Telefónica Data.
- Provided top tier strategy development and value based management consulting services to Fortune 100 corporations through a detailed, fact-based methodology, focused on maximizing shareholder value. Clients included Bank of America, First Union Bank, Bank of Montreal, and Champion International.

**Education**

**HARVARD UNIVERSITY GRADUATE SCHOOL OF BUSINESS ADMINISTRATION – BOSTON, MA**  
Master in Business Administration

**UNITED STATES COAST GUARD ACADEMY – NEW LONDON, CT**  
B.S. in Management with High Honors

**RONALD RECHTMAN**  
**Chief Technology Officer**  
**Q Link Wireless**

**Professional Experience**

- Senior technology professional that has been in professional software development since 2000 and has worked with programming languages since a very early age.
- Has been a technical team leader of software developers since 2002, has been direct consultant to the director or CTO of various companies since 2005, and has been directing IT departments as Director or CTO in multiple companies since 2008.
- Implemented solutions for different system requirements such as wireless solutions, VoIP and Long Distance, database design and optimization, pocket PC applications and smart client applications, and various websites, both Internet & intranet.
- Extensive programming languages knowledge, including Visual C/C++, ASP/ASP.NET, C#, VB.NET, SQL, and others not as widely used; database design experience using the most widely used database systems: Microsoft SQL Server, Pervasive, Oracle Mobile, MySql and FoxPro.
- Designed and implemented enterprise solutions for high transactional systems using technologies like COM/COM+, SOAP/Web Services, ATL/WTL/WCF, MS SQL/SSRS depending on the technologies available at the time.
- Worked on multiple secured web application solutions using technologies like XML/XSLT, CSS, DHTML, SSL, AJAX and jQuery.
- Over 4 years of direct telecom industry experience, including a leading domestic long distance provider and calling card platforms in the U.S.
- Over 5 years of government programs experience, including projects with Homeland Security, Medicare & Medicaid and now Lifeline.

**Education**

**UNIVERSITY OF SOUTH FLORIDA – TAMPA, FL**  
B.S. in Computer Engineering

**ANDREW LERMSIDER**  
**Chief Marketing Officer**  
**Q Link Wireless**

**Professional Experience**

- Expert direct response marketer with 21 years' experience building and marketing offline and online business with explosive growth under his marketing techniques.
- Authority in architecting direct response omni-channel marketing strategies incorporate, digital, retail, radio, TV and phone sales.
- Founded the first of its kind technology-centric financial services company that was strategically positioned and sold for \$32 million to TransUnion.
- Successfully developed and positioned for acquisition the fastest growing online Payday loan provider with 200% yearly ROI.
- Developed and marketed direct response based pet products with commercials on TV and radio, and drove CRO to become the one of the top performing affiliate offers online.
- Co-founded and ran several wellness product driven companies that incorporated multichannel and affiliate programs. Drove revenue to more than \$20 million per month in continuity billing.

**Education**

**NEW YORK UNIVERSITY – NEW YORK, NY**  
B.S. Marketing & Finance

## **PAUL TURNER**

**President**

**Q Link Wireless**

### **Professional Experience**

- Oversees certain aspects of the regulatory and legal departments of Q Link Wireless.
- Partner at Perlman, Bajandas, Yevoli & Albright, P.L. and head of the litigation group.
- Business attorney who focuses his practice in the areas of complex commercial litigation and arbitration. Clients include domestic and foreign entities, high-net worth individuals, and professional athletes.
- Served as general counsel for various Florida-based telecommunications companies with over \$500 million in annual revenue. He has also handled hundreds of litigation and arbitration matters mainly within Florida but also within Colorado, the District of Columbia, Georgia, New York, Ohio, Texas, Virginia, and Washington.
- Practice areas include Commercial Litigation/Arbitration, Shareholder Dispute Litigation/Arbitration, Restrictive Covenant Litigation/Arbitration, Trade Secret and Unfair Competition Litigation/Arbitration, and Telecommunications Litigation/Arbitration.
- Successfully litigated commercial matter in excess of \$70 million, arbitrated commercial matter in excess of \$100 million, obtained \$48 million judgment in federal litigation involving a Florida Ponzi scheme, and successfully negotiated and obtained favorable settlements in multiple litigation and arbitration matters.

### **Education**

**UNIVERSITY OF MIAMI – MIAMI, FL**

Juris Doctor

**UNIVERSITY OF MICHIGAN – ANN ARBOR, MICHIGAN**

Bachelor of Arts

**NOHA ASAD**  
**Vice President**  
**Q Link Wireless**

**Professional Summary**

Highly focused and creative Marketing and Telecom Executive with excellent records in business development, sales, and customer satisfaction. Adept at seeking out new technologies and remaining up-to-date on product upgrades and technological advances to ensure ongoing healthy business growth while emphasis on automation and efficiency.

**Professional Experience**

- Extensive high-technology and telecommunications industry experience
- Experienced marketing senior executive and business owner
- Strong proficiency with telecommunication service offers and operations management
- Excellent grasp of business case and financial analysis, sales management, and time management
- Exceptional skills in maintaining quality control policies and procedures
- High interpersonal and account management abilities
- Superior negotiating and marketing abilities
- Designed and implemented strategies to cross-sell and up-sell services to existing customer base.
- Managed the marketing division of a leading telecommunication company with gross annual revenues exceeding \$100M
- Worked with software developers, CIO and CTO to establish proper reporting for high internet transaction systems

**Core Competencies**

- |   |   |
|---|---|
| • New Market Expansion                        | • Strategic Market Research & Planning      |
| • Personnel Growth & Development              | • Direct Sales Force Start-Up & Development |
| • Special Pricing Contract Negotiation        | • National Account Acquisition              |
| • Multi-Office Sales Logistics                | • Channel Sales Strategies                  |
| • Sales Revenue Forecasting                   | • Sales and Customer Support Management     |
| • Advanced Proposal Strategies & Construction | • Training & Development                    |
| • Activity-Based Sales Leadership             | • Mobile Marketing and Advertising          |
| • Motivational Management with Results        |   |

**Educational Background**

Business Development

Marketing & Finance



**MARIANE FAHMY**  
**Business Development Director**  
**Q Link Wireless**

**Professional Experience**

- Experienced marketing senior executive with diversified background in sales, customer service, and operations management.
- Over 15 years of practical experience in telecom marketing, growth, and leadership.
- Proven experience operating in a rapid expansion environment, building relationships, and training sales teams to deal expertly with objections and to exceed objectives.
- Assisted company CEO with the day to day operations, projects, and additional management duties.
- Implemented national growth strategies with new and existing customers and lead marketing related event planning, advertising, and outreach campaigns.
- Qualified market opportunities in relation to geographical locations to focus company's resources for maximum effectiveness.
- Gathered and analyzed competitive information to secure market share and positioning.
- Managed the wholesale division of a leading telecommunication company with gross annual revenues exceeding \$50 million and led a large high performance sales team with a client base of over 9,000 wholesale agents and distribution channels nationwide.
- Provided sales training and assistance with account development and acquisition by using out-of-the-box solutions to significantly increase top line and bottom line performance.

**Education**

**UNIVERSITY OF ALBERTA – EDMONTON, CANADA**

Bachelor of Science